

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**UNITED STATES OF AMERICA,  
Plaintiff**

**VS.**

**0.519 ACRES OF LAND, MORE OR  
LESS, SITUATE IN STARR COUNTY,  
TEXAS AND DAVID F. REYES, JR., ET  
AL.  
Defendant**

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**7:25-CV-00149**

**VERIFIED CLAIM OF STARR COUNTY, TEXAS, et al.**

CLAIMANTS, Starr County, Texas, Starr County Farm to Market Road, Starr County Drainage District, Starr County Hospital District, and South Texas College Annual Maintenance, (“Taxing Authorities”), file this Verified Claim and would show the following:

1. The real property which is the subject of this action and on which this claim is filed is described in the United States’ Complaint in Condemnation and identified as follows:

Being a 0.519 of one acre (22,603 square feet) parcel of land, more or less being out of the Augustine de la Garza Survey, Abstract No. 83, Porcion 73, ancient jurisdiction of Camargo, Mexico, now Starr County, Texas, being out of a called 9.08 acres, Share 14, as described in Volume 171, Page 36, official Records of Starr County, Texas, and out of a called 2.1 acre tract conveyed to David S. Reyes by Correction Deed recorded in Volume 509, Page 291, Official Records of Starr County, Texas, said parcel of land being more particularly described by metes and bounds....”

2. Taxing Authorities are units of local government of the State of Texas.

3. This claim is filed by the undersigned attorney as the agent for Claimants and he is duly authorized to assert this claim on their behalf by virtue of a contract between the law firm and the Claimants for collection of delinquent ad valorem taxes made pursuant to TEX. PROP. TAX CODE ANN. §6.30(c).

4. Taxing Authorities are political subdivisions of the State of Texas authorized to levy and collect ad valorem taxes on the subject property. Any offsets and credits existing against the amounts due will be allowed.

5. Claimants are taxing units as defined by TEX. PROP. TAX CODE ANN. §1.04(12), and as such, levied ad valorem taxes on the subject property for the years and in the amounts appearing below:

<b><u>Property</u></b>	<b><u>Acct No.</u></b>	<b><u>Tax Year</u></b>	<b><u>Base Tax</u></b>
Midway Rd.	0036617	2018-2024	\$1,384.06

Claimants will levy ad valorem taxes on the subject property for 2025 in an amount to be determined. (*See Exhibit 1, Tax Statements*).

6. Section 32.01 of the Texas Property Tax Code creates a lien which perfects on January 1 of each tax year to the benefit of the Taxing Authorities to secure payment of *all* tax, penalty and interest imposed on the property. Those liens constitute valid, good faith interest in the subject property which are superior to all interest by virtue of TEX. PROP. TAX CODE ANN. §32.05.

7. Claimants reserve the right to amend this claim.

Respectfully Submitted,

ATTORNEY FOR TAXING AUTHORITIES

By: Douglas Steven Bird  
DOUGLAS STEVEN BIRD  
TX State Bar No. 02331330  
Southern Admission No. 343883  
ETHAN RANIS  
TX State Bar No. 24098303  
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(512) 447-6675 (Telephone)  
(512) 693-0728 (Facsimile)

STATE OF TEXAS                   §  
   §  
COUNTY OF TRAVIS           §

BEFORE ME, the undersigned authority on this day personally appeared Douglas Steven Bird, who being first duly sworn on oath deposed and said that he is the attorney for the Taxing Authorities as a partner in the law firm of Linebarger Goggan Blair & Sampson, LLP, and as such is authorized to make the foregoing petition on their behalf by virtue of a contract between the law firm and the Taxing Authorities for Collection of delinquent ad valorem taxes made pursuant to TEX. PROP. TAX CODE ANN. §6.30(c), that he has read the foregoing petition, has personal knowledge of each of the allegations set forth therein, and that each of those allegations is true and correct.

/s/ Douglas Steven Bird  
Douglas Steven Bird

SUBSCRIBED AND SWORN TO BEFORE ME, by the said Douglas Steven Bird, this the 23<sup>rd</sup> day of April, 2025, to certify which witness my hand and seal of office.



/s/ Lydia Rose Verosky  
NOTARY PUBLIC, State of Texas

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed electronically and is to be served by electronic transmission to all parties on the court's electronic mailing matrix on April 23, 2025.

/s/ Douglas Steven Bird  
Douglas Steven Bird